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AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Ryan Thick Telephone: (313) 234-3500

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United Stat	tes of America
v.	

Steven MARCHBANKS

Case No.

Case: 2:24-mj-30284 Assigned To : Unassigned

Assigned 10: Unassigned Assign. Date: 7/23/2024

USA V. MARCHBANKS (CMP)(CMC)

CRIMINAL COMPLAINT								
I, the con	mplainant in this ca	se, state that th	e following is tru	e to the best of my knowled	ge and belief.			
On or ab	out the date(s) of _	Ju	ly 23, 2024	in the county of	Wayne	in the		
Eastern	District of	Michigan	, the defendar	nt(s) violated:				
Code Section			Offense Description					
18 U.S.C. § 922(g)(1)			Felon in Possessio	n of a Firearm				
This crin	ninal complaint is b	ased on these t	facts:					
✓ Continued o	n the attached shee		10	Y Thuch Complainant's s	signature			
Sworn to before me and/or by reliable el Date: July 23, 2024		nce	<u>Spe</u>	cial Agent Ryan Thick - ATF Printed name of Robert J. White Judge's signature				
City and state: <u>Det</u>			Ho	onorable Robert J. White, U.S.D Printed name of	istict Judge			

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Ryan Thick, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I have been a Special Agent with ATF since November of 2022. I am currently assigned to the ATF Detroit Field Office.
- 2. I have a bachelor's degree in criminal justice and a master's degree in business management and leadership. To become an ATF Special Agent, I underwent ATF special agent basic and criminal investigator training at the Federal Law Enforcement Training Center.
- 3. Throughout my law enforcement career, I have participated in numerous state and federal investigations into firearm and explosive offenses.
- 4. I make this affidavit from personal knowledge based on my participation in this investigation, as well as communications with others who have personal knowledge of the events and circumstances described herein, and my review of reports by myself and/or other law enforcement agents, as well as information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

PROBABLE CAUSE

- 5. On July 23, 2024, the ATF executed federal search warrants at Steven MARCHBANKS' residence, located at XXXXX Mayfair Street, Flat Rock, MI 48134. MARCHBANKS was present at the location with another adult male and a minor.
- 6. When officers searched MARCHBANKS's residence, they initially located, inside a closet off of the kitchen, one (1) Taurus, model Millennium PT-140 Pro, .40 caliber pistol equipped with an empty magazine, and inside a closet of MARCHBANK's bedroom located upstairs, a box containing fourteen (14) rounds of .380 ammunition.
- 7. In a post-Miranda interview, MARCHBANKS indicated that the Taurus gun was his. When asked about firearms in the house, MARCHBANKS also told the agents about another gun behind the fridge in the kitchen.
- 8. Upon searching further, officers located one (1) Ruger, model Security-380 (3855), .380 caliber pistol with a loaded magazine behind the fridge in the kitchen. Officers also located sixty-four (64) rounds of assorted .22 long rifle ammunition in MARCHBANKS's bedroom.
- 9. I reviewed a criminal history check for MARCHBANKS. This check revealed MARCHBANKS has several felony convictions, including:

- 1985- 3rd Circuit Court, Wayne County, Michigan: Felony- Assault with Intent to do Great Bodily Harm Less than Murder or by Strangulation.
 MARCHBANKS was sentenced to 4-10 years' imprisonment.
- 1991- 3rd Circuit Court, Wayne County, Michigan: Felony- Controlled
 Substance- Delivery/ Manufacture Cocaine, Heroin, or another Narcotic less
 than 50 grams. MARCHBANKS was sentenced to probation.
- 1998- 3rd Circuit Court, Wayne County, Michigan: Felony- Controlled Substance- Delivery/ Manufacture Cocaine, Heroin, or another Narcotic less than 50 grams. MARCHBANKS was sentenced to 1 to 20 years' imprisonment.
- 1999-Hillsborough County Court, Tampa, Florida: Felony-Battery on Law Enforcement Officer, and Felony-Obstruct Oppose Officer with Violence.
 MARCHBANKS was sentenced to over 1 year's imprisonment.
- 2018-3rd Circuit Court Wayne County: Felony- Home Invasion-2nd Degree.
 Steven MARCHBANKS was sentenced to 2 years' probation.
- 10. Because Steven MARCHBANKS has been convicted of multiple felony offenses and served more than a year in prison for several of these convictions, there is probable cause to believe that MARCHBANKS is aware of his status as a convicted felon and that he is prohibited from possess firearms and ammunitions.

11. I consulted with ATF Nexus Agent Special Agent Michael Jacobs, who made a preliminary opinion, based on the located firearms' physical descriptions, that they were not manufactured in the State of Michigan and therefore previously traveled in interstate or foreign commerce.

CONCLUSION

12. Probable cause exists that on July 23, 2024, in the Eastern District of Michigan, Steven MARCHBANKS, a convicted felon, knowingly possessed two (2) firearms—specifically, one (1) Taurus, model Millennium PT-140 Pro, .40 caliber pistol and one (1) Ruger, model Security-380, .380 caliber pistol—which have previously travelled in interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).

Respectfully Submitted,

Ryan Thick, Special Agent Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Robert J. White

United States District Judge

Dated: July 23, 2024